

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JILL BLOOMBERG,

Plaintiff,

v.

AFFIDAVIT OF
JILL SANDUSKY

THE NEW YORK CITY DEPARTMENT OF
EDUCATION and CARMEN FARINA,

Defendant.
-----X

STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

JILL SANDUSKY, being duly sworn, deposes and states as follows:

1. I am an Assistant Principal of Park Slope Collegiate ("PSC") and a resident of Kings County.

2. I have personal knowledge of the facts contained in this affidavit, which I submit in support of plaintiff Jill Bloomberg's motion for temporary restraining order and preliminary injunction

3. As an Assistant Principal at PSC, I have seen, first-hand, the negative impact the OSI investigation of Principal Jill Bloomberg and two unnamed teachers has had on our school community. In large part due to Ms. Bloomberg's strong support and active voice in creating an anti-racist school community, teachers and students have, until now, felt empowered to speak up in the face of racism. Under her leadership teachers have fostered nurturing relationships with students that have allowed for students to feel safe at school. When our students feel attacked or wronged they reach out to their teachers who support their fight for equity.

4. In the weeks since we have been notified of the OSI investigation, teachers have been noticeably less comfortable with speaking out against racism and racist attacks, for fear of retaliation or incriminating themselves in some way. This is not the school Ms. Bloomberg has spent years growing. In the 13 years I have worked at Park Slope Collegiate, one thing has remained true, all decisions made by both administrators and teachers, if made with the best interests of the students at heart, would be supported by Ms. Bloomberg. But in the current climate, teachers are no longer willing to speak out against injustice.

5. Because of teachers' fear of becoming victims of the same type of retaliation that the DOE is now taking against Ms. Bloomberg, our students are directly affected in a very negative way. Building a school where students feel safe knowing that they can come to a teacher or administrator when they have been wronged by social injustice has taken years of hard-work and immeasurable commitment. In just a few weeks, all of this hard work has been undermined, and will only continue to deteriorate so long as the OSI investigation continues.

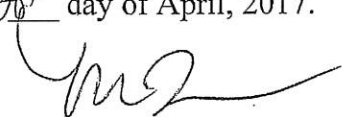
6. Our unofficial school motto, "An injustice to one is an injustice to all" is not merely a motto, but our mission that drives our actions as a unified school community. How can a school whose principal is facing an investigation for fighting for equality not be significantly impacted by the fear-mongering that goes along with an OSI investigation? It is difficult to assess now, but it will certainly be a devastating impact.

7. I strongly send my support for Jill Bloomberg and the two unnamed teachers and request that the investigation is immediately dismissed. Only after the investigation is dismissed and closed for good can we return to supporting our school community in our fight against racism. Our school prides itself on doing right by our students. This investigation has forced teachers to question and doubt their ability to openly engage in activism and openly support the

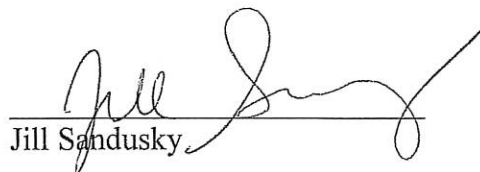
students in our community. It is for this exact reason that I think a dismissal of the investigation is completely and utterly necessary.

Sworn to before me this

20th day of April, 2017.



Notary Public MARIA CHICKEDANTZ
NOTARY PUBLIC-STATE OF NEW YORK
NO 02CH6315888
QUALIFIED IN KINGS COUNTY
MY COMMISSION EXPIRES 12-01-2018



Jill Sandusky